

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In the matter of:)	
)	Civil No. 15-cv-03230 (MIS)
THE COMPLAINT OF TAMARA SOPKA,)	
INDEPENDENT ADMINISTRATOR FOR THE)	
ESTATE OF OREST SOPKA, DECEASED, AND)	
AXESS HOLDING COMPANY, LLC AS OWNERS)	
OF A 2012 RINKER 310 EXPRESS MOTOR)	
VESSEL "AXESS" FOR EXONERATION FROM)	
OR LIMITATIONS OF LIABILITY)	
CIVIL NO. 15-CV-3230 (MIS))	

**MOTION FOR LEAVE TO WITHDRAW
AND FOR SUBSTITUTION OF COUNSEL**

Curt J. Schlom ("Schlom") and Corrine L. Conrad ("Conrad") of the law firm Wilson Elser Moskowitz Edelman & Dicker LLP move for leave to withdraw and to substitute P. Andrew Fleming ("Fleming") and Joshua E. Liebman ("Liebman") of the law firm Novack and Macey LLP as new counsel on behalf of Creative Yacht Management, Inc. d/b/a SailTime Chicago ("SailTime"). In support hereof, Schlom and Conrad state as follows:

1. Schlom and Conrad are currently SailTime's attorneys.
2. SailTime has asked attorneys Fleming and Liebman to represent it in this matter from this point forward and for attorneys Fleming and Liebman to substitute as its counsel in place of Schlom and Conrad.
3. Attorneys Fleming and Liebman are duly licensed to practice law in the State of Illinois and in the United States District Court for the Northern District of Illinois.
4. Granting this motion will not prejudice the parties or delay progress in this case.

WHEREFORE, Schlom and Conrad respectfully request that they each be granted leave to withdraw as counsel for SailTime, and that attorneys Fleming and Liebman each be allowed to substitute as attorneys of record and file an appearance for SailTime.

Respectfully submitted,

By: /s/ Curt J. Schlom

Curt J. Schlom (#6204308)
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CERTIFICATE OF SERVICE

The undersigned, Curt J. Schlom, certifies that on June 1, 2016, he electronically filed the foregoing Notice of Motion with the Clerk of the U.S. District Court for the Northern District of Illinois, via its CM/ECF system, which will send electronic notification to all counsel of record, who have consented to accept service by electronic means.

/s/ Curt J. Schlom

Curt J. Schlom